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## **EXHIBIT E**

11/6/2024

Richard Kadrey, et al. v. Meta Platforms, Inc. Highly Confidential - Attorneys' Eyes Only Sergey Edunov

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Page 1
            UNITED STATES DISTRICT COURT
          NORTHERN DISTRICT OF CALIFORNIA
               SAN FRANCISCO DIVISION
RICHARD KADREY, et al.,
          Individual and
          Representative
          Plaintiffs,
V.
                            )
                                Case No. 3:23-cv-03417-VC
META PLATFORMS, INC.,
          Defendant.
  ** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY **
      Videotaped Deposition of SERGEY EDUNOV
             San Francisco, California
            Wednesday, November 6, 2024
            Reported Stenographically by
       Michael P. Hensley, RDR, CSR No. 14114
               DIGITAL EVIDENCE GROUP
            1730 M Street, NW, Suite 812
               Washington, D.C. 20036
                   (202) 232-0646
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11/6/2024

## Richard Kadrey, et al. v. Meta Platforms, Inc. Highly Confidential - Attorneys' Eyes Only

Sergey Edunov

Page 130 /// 1 2 BY ATTORNEY STEIN: 3 If you turn to the second page --Q. Mm-hmm. 4 Α. -- it mentions that the original Llama was 5 6 trained on research datasets that couldn't be used 7 for commercial purposes. 8 Do you see that? 9 Yeah, I see it. Α. 10 Q. What's your understanding of why these research datasets could not be used for commercial 11 12 purposes? 13 ATTORNEY MORTON: Objection. I caution 14 the witness to the extent that might reveal any 15 attorney-client privileged information. 16 If you can answer to the extent without 17 revealing any information, you may do so. 18 THE WITNESS: Yeah, so that is based on 19 our recommendation we wrote from our legal team. 20 BY ATTORNEY STEIN: 21 What datasets was original -- the original Q. 22 Llama trained on?